

Section 7a Compliance Analysis

546 N. Mechanic Street
Jackson, Michigan

Performance Automotive, Inc.

February 15, 2010

ASTI ENVIRONMENTAL



Section 7a Compliance Analysis

546 N. Mechanic Street
Jackson, Michigan

February 15, 2010

Report Prepared For:


Performance Automotive, Inc.
3300 East Michigan Avenue
Jackson, Michigan 49202

Report Prepared By:

ASTI Environmental
660 Cascade West Parkway SE, Suite 210
Grand Rapids, Michigan 49546
P: 616-957-5601
F: 616-957-5629

ASTI Project Number 6715-15

Report Prepared by:


Matt Ramsey, EP
Environmental Scientist

Report Reviewed by:


Donald E. Penniman, CPG
Director – Western Great Lakes Office



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INTRODUCTION

This Section 7a Compliance Analysis has been prepared according to the Part 10 Rules promulgated under Part 201 of the Michigan Natural Resources and Environmental Protection Act, P.A. 451 of 1994, as amended (Act 451). Section 7a (1) provides that a person who owns or operates property that he/she has knowledge is a facility must do all the following, unless they are covered by the provisions of Section 7a (4) or (5).

1. Undertake measures to prevent exacerbation of existing contamination.
2. Exercise due care by undertaking response activity necessary to mitigate unacceptable exposure to hazardous substances, mitigate fire and explosion hazards due to hazardous substances, and allow for the intended use of the property in a manner that protects the public health and safety.
3. Take reasonable precautions against the reasonably foreseeable acts or omissions of a third party and the consequences that could result from those acts or omissions.

This Section 7a Compliance Analysis has been prepared for the Property located at 546 North Mechanic Street in Jackson, Michigan. A Category "S" Baseline Environmental Assessment (BEA) was completed on January 21, 2010 that discussed the presence of contaminated soil and groundwater from historical uses for manufacturing, machine shop, and automotive repair. The prospective owner, Performance Automotive, Inc., purchased the Property on November 24, 2009. The Property will be used for automotive parts sales and machine shop services in support of the automotive parts business.

The Section 7a Compliance Analysis has four main elements:

1. Detailed characteristics of property use;
2. Hazardous substance information;
3. Plan for response activities (if necessary); and
4. Evaluation and demonstration of compliance with Section 7a obligations.

No response activities are required to meet Section 7a compliance obligations for the Property other than maintenance of pavement and **secondary containment** described in the January 21, 2010 BEA. The Section 7a Compliance Analysis addresses all contaminants on the Property that exceed generic residential criteria.

1.0 DETAILED CHARACTERISTICS OF PROPERTY USE

1.1 Current Property Use

The Property is located on the southwest corner of East Ganson Street and North Mechanic Street in the southeast corner of Section 34, T2S, R1W, in the City of Jackson, Jackson County, Michigan. A Site Location Map is provided as Figure 1. The Property consists of a single parcel assigned parcel number 1-015100000.

Present structures on the Property are an industrial building occupying 31,554 square feet and a garage occupying 324 square feet. The Property is fenced on the north and west sides. The remainder of the Property is covered primarily with asphalt pavement.

1.2 Planned Property Use

The Property will be used by Performance Automotive, Inc. for automotive parts sales and machine shop services in support of the automotive parts business.

No major construction, renovation, or demolition activities are anticipated for the Property.

Municipal water and sewer is provided to the Property via the City of Jackson. Sanitary wastewater is discharged to the City of Jackson sanitary sewer system. Consumers Energy provides natural gas and electrical services to the Property. According to the Consumers Energy SIMs gas record for the Property, natural gas was connected to the subject building in 1973. Natural gas is used for fueling suspended gas heaters, forced-air furnaces, and water heaters located in the subject building. No manholes, manways, or boxes associated with utilities that would require special due care policies or procedures are present within the Property boundaries. Subsurface utility connections will not require special due care procedures other than routine maintenance.

A Site Features Map illustrating the Property boundaries, building footprint, parking and other features is provided as Figure 2.

2.0 HAZARDOUS SUBSTANCE INFORMATION

2.1 Presence of Hazardous Substances

ASTI performed Phase II ESA investigations on November 5, 2009 and December 15, 2009 to address recognized environmental conditions identified in the July 8, 2009 Phase I ESA and to provide current data for the present BEA. Nine soil borings, including three soil borings converted to temporary monitoring wells, were drilled and sampled on November 5, 2009. To better define the extent of groundwater contamination, five additional temporary monitoring wells were installed and sampled on December 15, 2009. One additional soil sample was collected from one of the temporary monitoring well boreholes. Sampling locations are illustrated on Figure 3. The Phase II ESA investigations are described in detail in the January 21, 2010 BEA.

A total of eight groundwater samples and six soil samples were transported under chain-of-custody to Brighton Analytical LLC. All samples collected on November 5, 2009 were analyzed for volatile organic compounds (VOCs); selected samples were analyzed for polynuclear aromatic compounds (PNAs), lead, Michigan-10 metals (arsenic, barium, cadmium, chromium, copper lead, mercury, selenium, silver, and zinc), glycols, and cyanide. Based on the results of analyses of these samples, the groundwater samples and soil sample collected on December 15, 2009 were analyzed for leaded and unleaded gasoline parameters.

Soil Contamination

Relevant exposure pathways for contaminants in soil are drinking water protection (DWP), groundwater/surface water interface protection (GSIP), direct contact (DC) and soil volatilization to indoor air inhalation (SVIAI).

Data for contaminants in soils detected at concentrations exceeding generic residential criteria during the November and December 2009 Phase II ESA investigations are summarized below:

Chemical Name	CAS Number	Criteria Exceeded	Highest Concentration (µg/Kg)	Location
Tetrachloroethene	127184	DWP	110	PA-SB-GP-3
Arsenic	7440382	DWP, DC	12,000	PA-SB-GP-3
Chromium	16065831	GSIP	11,000	PA-SB-GP-4
Selenium	7782492	GSIP	2,400	PA-SB-GP-7

Lead was detected in soil samples at concentrations exceeding its Default Background Level, but below any applicable generic residential criteria. The presence of elevated concentrations of arsenic, lead, selenium, and other metals is typical of soils in historic industrial areas.

Soil sample analytical results are summarized on Table 1. Metals listed on Table 1 were detected at concentrations above Default Background Levels. Figure 3 illustrates detections of tetrachloroethene and metals at concentrations exceeding generic residential criteria. None of the chemicals detected in soils at concentrations exceeding generic residential criteria are characteristic of hazardous substances to be stored or used by Performance Automotive, Inc.

Groundwater Contamination

Relevant exposure pathways for groundwater are drinking water ingestion (DW), groundwater/surface water interface (GSI), groundwater direct contact (GDC) and groundwater volatilization to indoor air inhalation (GVIAI).

GVIAI and GDC are relevant exposure pathways for Property, although detected contaminant concentrations are well below GVIAI and GDC criteria.

Data for contaminants in groundwater detected at concentrations exceeding generic residential criteria during the investigation are summarized on the following table:

Chemical Name	CAS Number	Criteria Exceeded	Highest Concentration (µg/L)	Location
Benzene	71432	DW, GSI	300	PA-GW-GP-8
Ethylbenzene	100414	DW, GSI	1,400	PA-GW-GP-8
1,2,3-Trimethylbenzene	526738	DW, GSI	1,200	PA-GW-GP-8
1,2,4-Trimethylbenzene	95636	DW, GSI	470	PA-GW-GP-8
1,3,5-Trimethylbenzene	108678	DW, GSI	660	PA-GW-GP-8
2-Methylnaphthalene	91576	DW	360	PA-GW-GP-8
Naphthalene	91203	DW, GSI	680	PA-GW-GP-8
n-Butylbenzene	104518	DW	100	PA-GW-GP-8
n-Propylbenzene	103651	DW	240	PA-GW-GP-8
Xylenes	1330207	DW, GSI	2,800	PA-GW-GP-8
Lead	7439921	DW	37	PA-GW-GP-10
Cyanide	57125	GSI	5.2	PA-GW-GP-6

Toluene, isopropylbenzene, sec-butylbenzene, and tetrahydrofuran were also detected in groundwater samples at concentrations below generic residential criteria.

Groundwater contamination by VOCs is limited to the northwest portion of the Property as indicated by the absence of VOCs at concentrations exceeding generic residential criteria in temporary monitoring wells PA-GW-GP-11, PA-GW-GP-12, PA-GW-GP-13, and PA-GW-GP-14 as shown on Figure 3. The extent of groundwater contamination to the east of temporary monitoring well PA-GW-GP-10 is estimated based on the direction of groundwater flow determined in previous environmental investigations. Lead was detected in groundwater samples throughout the Property and appears to be from an off-site source. Cyanide in groundwater is limited to the southern property boundary adjoining the Michner Plating property.

Groundwater sample analytical results for compounds detected in any temporary monitoring well are summarized on Table 2. Detections of compounds detected at concentrations exceeding generic residential criteria are illustrated on Figure 3.

2.2 Other Media

No other environmental media were sampled during this investigation.

2.3 Abandoned Containers

No abandoned or discarded barrels, drums, containers, or other receptacles containing hazardous substances are present on the Property. Small containers of oil observed during a previous site inspection have been removed from the Property.

2.4 Fire and Explosion Hazards

No conditions that could be considered fire or explosion hazards (such as storage tanks or drums containing flammable materials or free product in the subsurface) have been observed at the Property. No volatile organic compounds were detected at concentrations to be flammable or explosive in soil samples collected during the 2009 Phase II ESA. No free liquids were observed in soil borings during the 2009 investigation.

2.5 Exposure Pathways

The potential exposure pathways for soil contamination at the Property, based on the observed contaminant concentrations, are direct contact, groundwater/surface water protection, drinking water protection, and soil volatilization to indoor air. Potential exposure pathways for groundwater are drinking water, groundwater contact, groundwater/surface water interface, and groundwater volatilization to indoor air.

2.5.1 Direct Contact

No detections in groundwater samples exceeded the generic residential criteria for groundwater direct contact criteria. Under these conditions, the direct contact exposure pathway for groundwater is not relevant or complete. Detections of arsenic in soil exceeded the direct contact criteria. The direct contact exposure pathway for soil is relevant and could become complete if the pavement cover was breached.

2.5.2 Groundwater/Surface Water Interface

Exposure by discharge to surface water is potentially complete. The Grand River is located in close proximity to the west of the Property. Detections of chromium and selenium in soil exceed GSI criteria. Detections of benzene, ethylbenzene, 1,2,3-trimethylbenzene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, naphthalene, xylenes, and cyanide in groundwater exceed GSI criteria.

2.5.3 Drinking Water

Detections of tetrachloroethene and arsenic in soil exceeded the drinking water protection criteria. Detections of benzene, ethylbenzene, 1,2,3-trimethylbenzene, 1,2,4-

trimethylbenzene, 1,3,5-trimethylebenzene, 2-methylbenzene, naphthalene, n-butylbenzene, n-propylbenzene, xylenes, and lead in groundwater exceeded the drinking water criteria. However, the drinking water pathway is not a complete pathway for the Property. Water is provided exclusively by the City of Jackson. Extraction of groundwater for potable uses will not be permitted by Performance Automotive, Inc. The existing buildings and pavement provide no means of exacerbating existing contamination. The soil contamination is concrete or asphalt, which is considered a sufficient barrier to prevent exacerbation of existing contamination. The groundwater contamination is overlain by concrete or asphalt, which is considered a sufficient barrier to prevent exacerbation of existing contamination. As such, no additional due care obligations or measures are needed to address the groundwater contamination exceeding the drinking water pathway.

2.5.4 Volatilization to Indoor Air

No detections in soil or groundwater samples exceeded the volatilization to indoor air criteria. Under these conditions, the volatilization to indoor air inhalation pathway is not complete.

2.6 Intended Hazardous Substance Use

Hazardous substances to be used or stored on the Property are the following:

- Motor Oil
- Automatic transmission fluid
- Gear oil
- Hydraulic oil
- Antifreeze (glycol)
- Mineral Spirits
- Acetone
- Refrigerant

No other hazardous substance use is anticipated on the Property, other than cleaning and maintenance products in containers and quantities typical of residential or commercial office use.

3.0 PLAN FOR RESPONSE ACTIVITIES

3.1 Response Activities

No response activities are necessary for compliance with Section 20107a other than the following activities. These measures are described in the January 21, 2010 BEA as engineering controls to prevent potential releases from entering the subsurface and commingling with existing contamination.

Concrete Pavement

The entire interior of the building is paved with concrete approximately three to six inches thick. All exits from the buildings exit onto paved surfaces. The concrete pavement within the building is in good condition. This paved interior serves as secondary containment for oils and other liquids anticipated to be used within the building by Performance Automotive, Inc. Cracks will be caulked using silicone caulk or other caulking compound that is resistant to oils and petroleum-based solvents. The pavement will be inspected annually and any new cracks or worn caulking will be patched or re-caulked.

Drains

Trench drains are present throughout the building. The trench drains on the south end of the building have already been sealed with concrete. The remaining trench drains in the north end of the building will be sealed with a high early strength concrete mix.

Oil and Automotive Fluids Storage

Oil and automotive fluids in 55-gallon drums and 5-gallon pails will be stored within secondary containment pads in the storage area. Spill kits including sorbent pads and granular sorbents will be placed in the storage area.

The building is accessed by overhead doors suitable for access by large trucks. All deliveries of automotive fluids and removal of spent fluids will be indoors on paved surfaces, with engineering controls as described above.

Exterior

The entire exterior area of the property will be paved with concrete or asphalt, with the exception of small areas of grass along the south and southwest side portions of the building. Cracks in the existing asphalt will be cleaned of vegetation and debris and

patched with a rubberized asphalt material. Areas of existing asphalt that are highly deteriorated will be repaired by removing broken pavement, replacing and recompact the sub grade materials, and repaving with asphalt a minimum of three inches thick. Following patching, each crack, expansion joint, or patched area will be inspected and any gaps will be re-patched.

The present areas of grass will be paved with asphalt a minimum of three inches thick or covered with an impermeable membrane resistant to petroleum products and surfaced with landscaping material such as gravel or bark.

3.2 Effectiveness of Response Activities

Pavement of the areas overlying contaminated soils and groundwater will prevent tracking of impacted soils by foot or vehicle traffic and will avoid or prevent excessive infiltration of precipitation or snowmelt into the impacted soils. Pavement will also prevent erosion of contaminated soils and transport by storm water runoff. Sealing, caulking, repair, and maintenance of all cracks, trench drains, and floor drains will effectively prevent spilled or leaked liquids from entering the subsurface and commingling with the existing contamination.

Repair and maintenance of pavement will effectively prevent spilled or leaked liquids from entering the subsurface and commingling with the existing contamination.

3.3 Restrictions on Property Use

No excavation and/or dewatering will occur on the Property unless directed and supervised by an employee or agent of Performance Automotive, Inc. Excavated soils will not be removed from the Property unless they are sampled and analyzed for contaminants. If excavated soils are impacted, landfill disposal may be required. Construction equipment leaving the Property will be swept or sprayed to avoid removing minor amounts of soil from the Property. Construction contractors will take precautions to avoid tracking soils into the public roadways, consistent with ordinances in most jurisdictions. Construction contractors will be advised of the prohibition of soil removal and requirements to clean construction equipment before leaving the Property.

In the event dewatering of excavations becomes necessary, permits for discharge of pumped water to storm or sanitary sewers may be required, or pumped water may need to be collected and hauled to a licensed treatment facility.

Potable water wells will not be installed on the Property and Performance Automotive, Inc. will not permit extraction of groundwater for potable uses. No dry wells or drainfields will be constructed on the Property.

3.4 Monitoring and Maintenance

Concrete and asphalt pavement will be maintained. Exterior and interior paved surfaces will be inspected by maintenance staff. Any new cracks or deteriorated patching or caulking will be patched or recaulked as appropriate. Any sealed cracks and/or drains will be inspected by maintenance staff and patched or recaulked as necessary. Pavement repairs will be performed after any subsurface work or as needed due to pavement wear or weathering.

4.0 EVALUATION AND DEMONSTRATION OF COMPLIANCE WITH SECTION 7A OBLIGATIONS

4.1 Exacerbation

4.1.1 Prevention of Exacerbation

There will be no activities in the area of impacted soils and groundwater that would allow increased migration of contaminants. The presence of pavement and sealing of cracks and drains/wells will prevent excessive infiltration of precipitation or snowmelt from entering the subsurface and will prevent tracking of impacted soils by foot traffic. No dry wells or drainfields will be constructed.

4.1.2 No Increase in Response Costs

There will be no new, permanent structures placed over the areas of contaminated soils and groundwater. If active remediation is required in the future, accessibility will not be reduced by response activities.

4.2 Due Care

The maintenance of pavement over the area of contaminated soils and prevention or supervision of excavation will prevent unacceptable exposures by direct contact or surface water pathways.

Although detected concentrations of contaminants do not exceed the Commercial IV soil or groundwater direct contact criteria applicable to construction workers, due care procedures will apply to any excavation or construction activities that breach the pavement surface. If any excavation or dewatering activities are conducted on the Property, appropriate health and safety procedures will be followed. A health and safety plan summary is presented in Attachment A. Health and safety procedures will apply to Performance Automotive, Inc. personnel, contractors and subcontractors, and public entities and their contractors and subcontractors. Performance Automotive, Inc. will inform utility companies or public entities, whose contractors and subcontractors are not hired by Performance Automotive, Inc., of the presence of contamination and will provide copies of the health and safety procedures.

Potable drinking water is supplied to the Property by the Jackson Water and Sewer Department; therefore, Performance Automotive, Inc. will not install potable water wells

on the Property and will not permit extraction of groundwater for potable uses. Municipal water will also be used for fire suppression and/or non-potable uses.

4.3 Reasonable Precautions

Access to the area of contaminated soils and groundwater will be restricted by pavement. The area will be under daily observation by Performance Automotive, Inc. employees, or its tenants. Pavement will be maintained and repaired as needed.

Prevention of unsupervised excavation or tracking of contaminated soils, as discussed above, routine observation of the area, and maintenance of pavement will constitute precautions against the reasonably foreseeable acts or omissions of a third party.

Tables

Table 1

546 N. Mechanic Street
Jackson, Michigan
Soil Analytical Results
(All concentrations in micrograms per kilogram (ug/kg))

Analytical Parameters	Part 201 Generic Residential Criteria							Soil Samples				
	Chemical Abstract Service Number	Reporting Limits (ug/kg)	State Default Background Levels	Drinking Water Protection Criteria	Groundwater Surface Water Interface Protection Criteria	Direct Contact Criteria	Soil Volatilization to Indoor Air Criteria	PA-SB-GP-1	PA-SB-GP-2	PA-SB-GP-3	PA-SB-GP-4	PA-SB-GP-7
Sample Depth (in feet)								1-2'	2-3'	2-4'	2.5-4.5'	11-12'
Sample Date								11/5/09	11/5/09	11/5/09	11/5/09	11/5/09
VOCs												
Tetrachloroethene	127184	50		100	900 (X)	88,000	11,000	ND	ND	110	ND	ND
Metals												
Arsenic (B)	7440382	100	5,800	4,600	70,000 (X)	7,600	NLV	-	8,700	12,000	8,100	14,000
Chromium (B, H)	16065831	500	18,000	30,000	3,300	2,500,000	NLV	-	8,700	6,100	11,000	8,300
Lead (B)	7439921	1,000	21,000	700,000	(G,X)	400,000	NLV	-	40,000	9,600	100,000	25,000
Selenium (B)	7782492	200	410	4,000	400	2,600,000	NLV	-	430	620	330	2,400
Silver (B)	7440224	100	1,000	4,500	100 (M); 27	2,600,000	NLV	-	ND	ND	110	ND

Notes:

- All samples were analyzed by Brighton Analytical LLC using various methods.
Concentrations have been compared with P.A. 451, Part 201 Generic Residential Criteria RRD Operational Memorandum #1, (January 23, 2006).
- XX** Shaded values indicate concentrations which exceed one or more Part 201 Criteria and statewide default background levels if appropriate.
- (B) Statewide default background levels for inorganics may be substituted if higher than the criteria.
(D) Calculated criterion exceeds 100%, criteria reduced to 100% or 1,000,000,000 ug/kg.
(G) The GSI value is pH or water hardness dependent.
(H) If analytical data are provided for total chromium only, they shall be compared to the cleanup criteria for Cr VI.
(M) Calculated criterion is below the analytical detection limit (TDL), therefore, the criterion defaults to the TDL.
(Q) Criteria for carcinogenic polycyclic aromatic hydrocarbons (PNAs) were developed using "relative potential potencies" to benzo (a) pyrene.
(X) The groundwater surface water interface criterion shown is not protective for surface water used as a drinking water source.
(Z) Mercury is typically measured as total mercury.
- NLL = Hazardous substance is not likely to leach under most soil conditions.
NLV = Hazardous substance is not likely to volatilize.
NA =Not available or not applicable.
ND = Not detected at or above the Method Detection Limit (MDL). Raised detection limits were required for samples that required dilution.
ID = Inadequate data to develop criterion.
= Parameter was not analyzed in this sample.

Table 2

546 N. Mechanic Street
Jackson, Michigan

Groundwater Analytical Results
(All concentrations in micrograms per liter (ug/L))

Analytical Parameters	Part 201 Generic Residential Criteria						PA-GW-GP-6	PA-GW-GP-8	PA-GW-GP-9	PA-GW-GP-10	PA-GW-GP-11	PA-GW-GP-12	PA-GW-GP-13	PA-GW-GP-14
	Chemical Abstract Service Number	Reporting Limits (ug/kg)	Drinking Water Criteria	Groundwater Surface Water Interface Criteria	Groundwater Contact Criteria	Groundwater Volatilization to Indoor Air Inhalation Criteria								
Sample Date							11/5/09	11/5/09	11/5/09	12/15/09	12/15/09	12/15/09	12/15/09	12/15/09
Screen Depth							8.5'	11'	9'	12'	12'	12'	10'	8.5'
VOCs														
Benzene (I)	71432	1	5.0 (A)	200 (X)	11,000	5,600	ND	300	5	2	ND	ND	ND	ND
Ethylbenzene (I)	100414	1	74 (E)	18	170,000 (S)	110,000	ND	1,400	110	130	ND	ND	ND	ND
Methyl-t-butyl-ether (MTBE)	1634044	5	40 (E)	730 (X)	610,000	47,000,000 (S)	ND	ND	ND	ND	ND	ND	ND	ND
Toluene (I)	108883	1	790 (E)	140	530,000 (S)	530,000 (S)	2	81	34	4	ND	ND	ND	ND
1,2,3-Trimethylbenzene	526738	1	63 (E)	17	56,000 (S)	56,000 (S)	ND	1,500	90	130	ND	ND	ND	ND
1,2,4-Trimethylbenzene (I)	95636	1	63 (E)	17	56,000 (S)	56,000 (S)	ND	470	210	220	ND	ND	ND	ND
1,3,5-Trimethylbenzene (I)	108678	1	72 (E)	45	61,000 (S)	61,000 (S)	ND	600	67	110	ND	ND	ND	ND
2-Methylnaphthalene	91576	5	260	940 (X)	25,000 (S)	ID	ND	360	15	54	ND	ND	ND	ND
Naphthalene	91203	5	520	13	31,000 (S)	31,000 (S)	ND	680	59	45	ND	ND	ND	ND
n-Butylbenzene	104518	1	80	ID	5,900	ID	ND	100	17	ND	ND	ND	ND	ND
Isopropylbenzene	98828	1	800	ID	56,000 (S)	56,000 (S)	ND	190	15	27	ND	ND	ND	ND
n-Propylbenzene	103651	1	80	ID	15,000	ID	ND	240	29	ND	ND	ND	ND	ND
p-Isopropyltoluene	99876	1	NC	NC	NC	NC	ND	ND	3	ND	ND	ND	ND	ND
sec-Butylbenzene	135988	1	80	ID	4,400	ID	ND	57	3	-	-	-	-	-
Tetrahydrofuran	109999	5	95	11,000 (X)	1,600,000	6,900,000	ND	ND	10	ND	ND	ND	ND	ND
Xylenes (I)	1330207	3	280 (E)	35	190,000 (S)	190,000 (S)	ND	2,800	410	69	ND	ND	ND	ND
Metals														
Arsenic	7440382	1	10	150(X)	4,300	NLV	3	ND	ND	-	-	-	-	-
Chromium	16065831	5	100 (A)	(G,X)	290,000,000	NLV	9	ND	ND	-	-	-	-	-
Lead	7439921	3	4.0 (L)	(G,X)	ID	NLV	17	15	ND	37	26	15	ND	26
Inorganics														
Cyanide	57125	5	200 (A)	1.2	57,000	NLV	7	ND	ND	ND	ND	ND	ND	ND

Notes:

All samples were analyzed by Brighton Analytical LLC

Concentrations have been compared with P.A. 451, Part 201 Generic Residential Criteria RRD Operational Memorandum #1 (January 23, 2006).

XX Shaded values indicate concentrations which exceed one or more Part 201 Criteria and statewide default background levels if appropriate.

(A) Criterion is the state of Michigan drinking water standard established pursuant to Section 5 of 1976 PA 399, MCL 325.1005.

(E) Criterion is the aesthetic drinking water value.

(G) Groundwater / Surface Water Interface criterion depends on pH and/or hardness of receiving water body

(I) Hazardous substance may exhibit the characteristic of ignitability.

(S) Criterion defaults to the hazardous substance-specific water solubility limit.

(X) The groundwater surface water interface criterion shown is not protective for surface water used as a drinking water source.

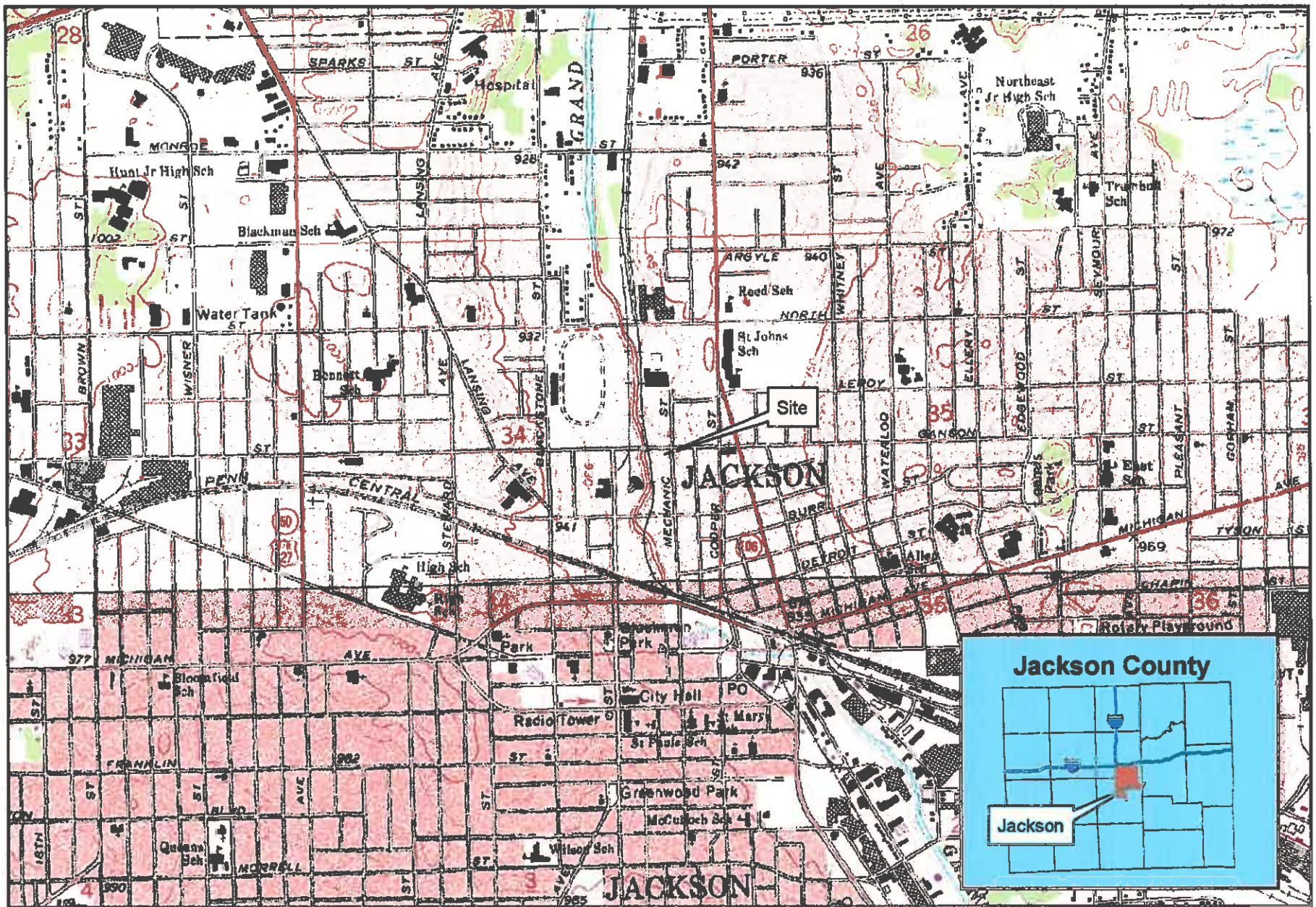
NA Not available or not applicable.

NC No criteria have been established for this compound

ND Concentrations were below the detection limit.

- Substance not analyzed in this sample.

Figures



546 N. Mechanic St. Jackson, MI

2,000 1,000 0 2,000 Feet



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Created for: Performance Automotive Inc.
Created by: AGS, June 26, 2009, ASTI Project 6715-15

Figure 1 - Site Location Map



LEGEND

- Property Line
- X Pad-Mounted Transformer
- ⊕ Pole-Mounted Transformer
- Fire Hydrant

546 N. Mechanic St.

Jackson, MI

Created for: Performance Automotive, Inc.
ASTI Project 6715-15, JMD, November 23, 2009



Figure 2 - Site Features Map

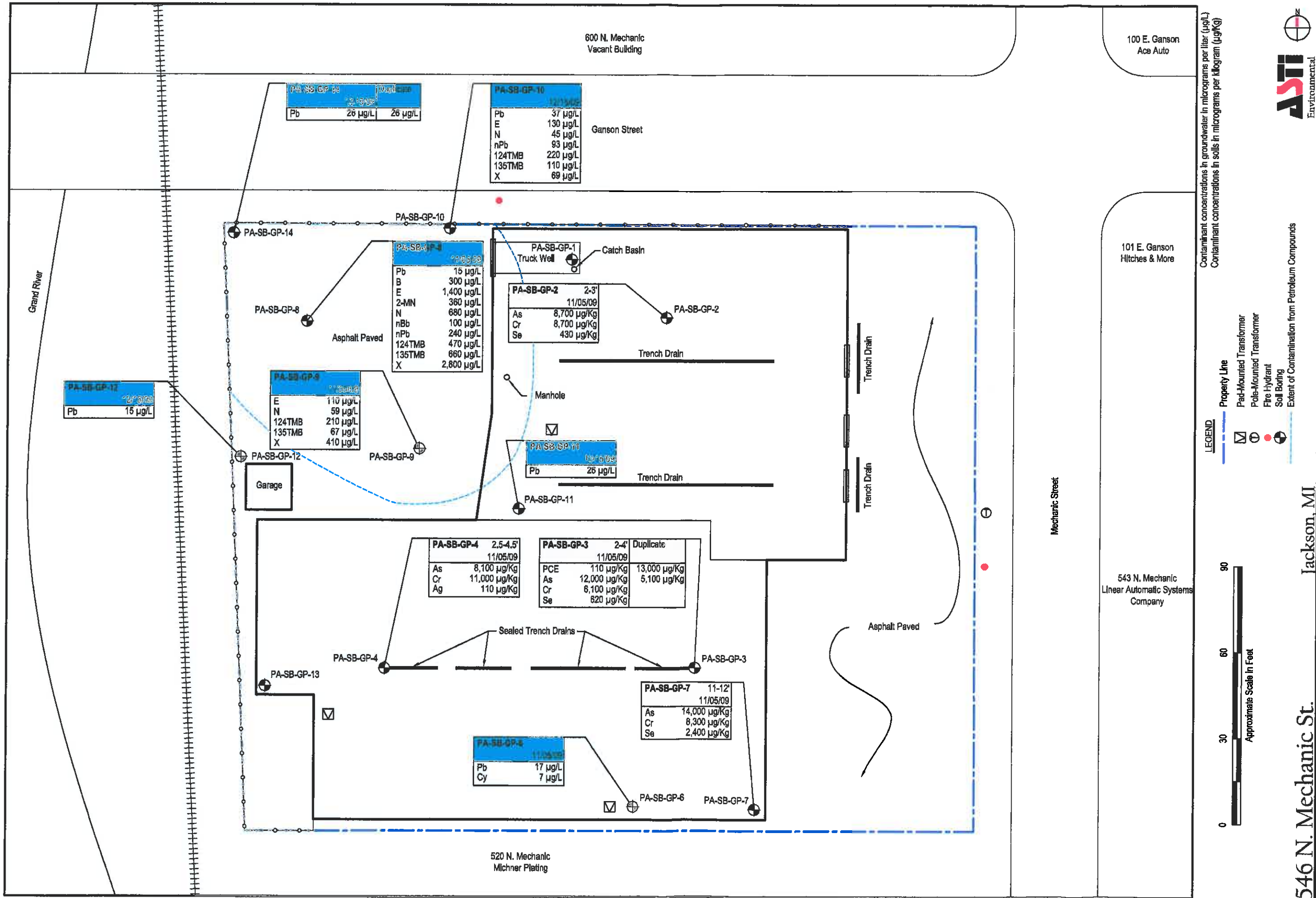


Figure 3 - Soil Boring Locations Map with Analytical Results

Attachment A

Health and Safety Procedures for Excavations

HEALTH AND SAFETY PROCEDURES FOR EXCAVATIONS

**546 North Mechanic Street
Jackson, Michigan**

Soil and groundwater contamination are present underlying the 546 North Mechanic Street property from historical uses of this property and nearby properties. Soils are contaminated with arsenic, chromium, selenium, and tetrachloroethene. Groundwater is contaminated with lead, cyanide, benzene, ethylbenzene, 1,2,3-trimethylbenzene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, 2-methylnaphthalene, naphthalene, n-butylbenzene, n-propylbenzene, and xylenes. Most of the contaminants in groundwater are components of gasoline remaining from former leaking underground storage tanks.

Specific contaminants are described in detail in the Baseline Environmental Assessment and Section 7a Compliance Analysis prepared for this property.

These health and safety procedures apply only to the presence of contaminants in soils and groundwater. Standard excavation and construction safety practices, as required by state and federal law, should be followed at all times.

1. Wear gloves, long pants, and long-sleeved shirts to avoid skin contact with contaminated soils.
2. If saturated soils are encountered, wear waterproof boots and gloves.
3. Do not eat, drink, or smoke in or adjacent to the excavation area.
4. Leave the excavation area and wash hands before eating, drinking or smoking.
5. Avoid tracking soils from the excavation area. Scrub soils from boots and equipment before leaving the property.
6. Work clothes should be laundered separately from other household laundry.